

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

**In Re: Joseph DeSantis** ) **Case No. 19-13222-MSH**  
**Debtor** ) **Chapter 13 Proceeding**  
                  ) **October 21, 2019**

**OBJECTION TO CONFIRMATION OF PLAN**

U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2018-RPL3 (the “Creditor”), hereby objects to confirmation of the Debtor's Chapter 13 Plan dated October 11, 2019 (the “Plan”), in connection with the above referenced matter for the following reasons:

1. The Plan does not provide for payment of the Creditor's pre-petition mortgage arrearage estimated to be \$31,145.09, with an estimated total debt of \$300,448.69. The Creditor anticipates filing its Proof of Claim on or before the bar date of December 2, 2019.

By /s/ Andrew S. Cannella  
Andrew S. Cannella  
Movant's Attorney  
BBO #680572  
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CERTIFICATION OF SERVICE

I hereby certify that on this 21<sup>st</sup> day of October, 2019, a copy of the foregoing was served to the following:

Joseph DeSantis  
Debtor  
303 Forest St  
Marshfield, MA 02050  
*Via First Class Mail*

Lawrence L. Hale, Esq.  
Debtor's Attorney  
*Via Electronic Notice of Filing*  
U.S. Trustee

Carolyn Bankowski-13, Esq.  
Trustee  
*Via Electronic Notice of Filing*

*Via Electronic Notice of Filing*

By /s/ Andrew S. Cannella

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